

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, )  
 )  
 v. ) CRIMINAL NO. 13-10200-GAO  
 )  
 DZHOKHAR TSARNAEV )

**MOTION TO LATE-FILE OPPOSITION TO  
DEFENDANT'S SECOND MOTION FOR CHANGE OF VENUE**

The United States of America, by and through its undersigned counsel, respectfully moves for leave to file the attached Opposition to Defendant’ Second Motion for Change of Venue two days after the original filing deadline of December 15, 2014. As grounds for this motion, the government states that the necessity of meeting other simultaneous or near-simultaneous filing deadlines in this case left the government too little time to draft and file a proper response to Tsarnaev’s motion.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ William D. Weinreb  
WILLIAM D. WEINREB  
ALOE S. CHAKRAVARTY  
NADINE PELLEGRINI  
Assistant U.S. Attorneys

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 15, 2014.

/s/ William D. Weinreb  
WILLIAM D. WEINREB